Lincoln Pulp and Paper Co., Inc. Penobscot County Lincoln, Maine A-177-70-D-A Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #2

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Lincoln Pulp and Paper Co. (LPP)
LICENSE NUMBER	A-177-70-D-A
LICENSE TYPE	Part 70 Section 502(b)(10) Change
NAICS CODES	322122
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	Main St., Lincoln
DATE OF LICENSE ISSUANCE	October 22, 2002
DATE OF AMENDMENT ISSUANCE	March 5, 2004
LICENSE EXPIRATION DATE	October 22, 2007

B. Application Classification

The application for LPP does not include the licensing of increased emissions or the installation of new or modified equipment. The request by LPP does not cause emissions in excess of the standards in the permit (whether expressed therein as a rate of emissions or in terms of total emissions) and qualify as a 502(b)(10) of the Clean Air Act.

C. Revision Description

As of January 16, 2004, LPP has been forced due to financial hardship to cease operations at the LPP facility located in Lincoln, Maine. In an effort to protect physical assets so the facility may remain a viable operation at some point in the future, attempts to keep critical areas heated are being sought. Without production to provide cash flow to the company, there is little money to buy the needed fuel for heating purposes.

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LPP had undergone a 502(b)(10) change through air emission license amendment A-177-70-C-A issued January 16, 2004. This amendment allowed for the following oil firing scenario to maintain "warm status" for the mill:

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Source	Licensed Oil Heat Capacity (MMBtu/hr)	Fuel Sulfur Content by Weight required by current license	Proposed Heat Input (MMBtu/hr)	Proposed Fuel Sulfur by Weight
No. 2 Recovery Boiler	≈ 500 MMBtu/hr	0.7% when firing 100% oil for no more than 350 hours in a 12 month period	200 MMBtu/hr	2.0 % when firing 100% oil without an hourly limit
No. 7 or No. 6 Power Boiler	100.1 MMBtu/hr	0.7%	50 MMBtu/hr	2.0%

LPP is now requesting a variation to this scenario so that the #2 Recovery Boiler can be taken off-line for cleaning. This is being done in preparation of a future buyer operating the Recovery Boiler. Therefore, with the #2 Recovery Boiler taken off-line the #6 and #7 Power Boilers may need a higher heat input capacity to generate enough steam to heat the mill's current assets.

Under the new scenario, LPP is proposing to the Department that a Part 70 Section 502 (b)(10) change be implemented. This change would allow LPP two separate scenarios. MEDEP modeled the following proposed scenarios using ISCST3:

- The combined heat input for Power Boilers #6 and #7 would be restricted to 130 MMBtu/hr and be allowed to fire 2.0% sulfur fuel, or
- The combined heat input would be restricted to 150 MMBtu/hr for boilers #6 and #7 with the maximum sulfur content of the fuel oil not to exceed 1.7% by weight.

The results demonstrated that emissions from these firing configurations will not cause or contribute to violations of Maine Ambient Air Quality Standards. The operation of the boilers under the above conditions is allowed until such time as the mill resumes normal operations. All other units would only have minimal firing occurring to prevent freezing and may not operate for production purposes.

Under these scenarios, there will be no net increase in emissions greater than the facility's licensed allowed under air emission license A-177-70-A-I. Therefore, the Department has determined that the proposed conditions constitute a minor revision to be processed as a Part 70 Section 502(b)(10) change. If there is a

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return to normal operational conditions or if anticipated heat inputs, for Power Boilers #6 and #7, exceed these limits then LPP will immediately resume operation as per the existing Part 70 air emissions license.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 Section 502(b)(10) change A-177-70-D-A subject to the conditions found in Air Emission License A-177-70-A-I and in addition to the following conditions

The following are new Conditions:

(44) The following shall apply from the date of this license issuance to June 1, 2004:

LPP may fire #6 fuel oil with a sulfur content not to exceed the following restrictions for Power Boilers #6 and #7:

- The combined heat input for Power Boilers #6 and #7 would be restricted to 130 MMBtu/hr and be allowed to fire 2.0% sulfur fuel, or
- The combined heat input would be restricted to 150 MMBtu/hr for boilers #6 and #7 with the maximum sulfur content of the fuel oil not to exceed 1.7% by weight.
- LPP shall comply with Air Emission License A-177-70-A-I when normal operations return.
- LPP shall keep daily records of the amount of fuel fired and keep sulfur content fuel receipts.

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(45)	This amendment shall expire concurrently with Air Emission License A-177-70-A-I.
DON	IE AND DATED IN AUGUSTA, MAINE THISDAY OF2004.
DEP.	ARTMENT OF ENVIRONMENTAL PROTECTION
BY:_	
PLE	DAWN R. GALLAGHER, COMMISSIONER ASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES
	of initial receipt of application: March 5, 2004 of application acceptance: March 5, 2004
Date	filed with the Board of Environmental Protection:
This	Order prepared by Edwin Cousins, Bureau of Air Quality.